

**IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION**

**JUAN LOZADA-LEONI,**

**Plaintiff,**

**vs.**

**MONEYGRAM INTERNATIONAL, INC.,  
and MONEYGRAM PAYMENT  
SYSTEMS, INC.,  
Defendants.**

**Civil Action No. 4:20-cv-68**

---

**INTERVENOR KLG'S MOTION FOR LEAVE TO FILE ITS ORIGINAL COMPLAINT  
FOR ATTORNEY'S FEES**

---

Intervenor KLG, by and through its counsel, hereby files this Motion for Leave to File Its Original Complaint for Attorney's Fees against Plaintiff Juan Lozada-Leoni pursuant to Federal Rule of Civil Procedure 3 and, in support thereof, states the following:

1. KLG represented Plaintiff in the above-captioned matter and provided legal services to Plaintiff from July 2016 to mid-April 2020.
2. Plaintiff has failed to pay for such services.
3. Based on Plaintiff's failure to pay for services rendered by KLG, KLG moves to file its Original Complaint alleging breach of contract and quantum meruit claims.
4. The proposed Original Complaint is attached hereto as "Exhibit A."
5. Rule 3 provides that a civil action is commenced by filing a complaint with the court.

**INTERVENOR KLG'S MOTION FOR LEAVE TO FILE COMPLAINT FOR ATTORNEY'S FEES**

6. The allegations contained in KLG's Original Complaint will not complicate the underlying litigation by excessive multiplication of the issues.
7. Further, the filing of the Original Complaint is essential to protect KLG's interest.
8. Accordingly, Intervenor KLG respectfully requests that the Court grant KLG leave to file its Original Complaint for Attorney's Fees.

Respectfully submitted,

*/s/ Steve Kardell*  
Steve Kardell  
Texas State Bar No.  
11098400  
E-mail:  
[skardell@kardelllawgroup.com](mailto:skardell@kardelllawgroup.com)  
KARDELL LAW GROUP  
4514 Cole Avenue, Suite  
600  
Dallas, Texas 75205  
Telephone: (214) 616-4654  
Facsimile: (469) 729-9926  
ATTORNEY FOR INTERVENOR

**CERTIFICATE OF CONFERENCE**

During the week of 12/07/2020, I conferred by email with Susan Hutchison, counsel for Plaintiff, in the manner required under Local Rule 7(h) regarding the relief requested herein. Plaintiff is opposed to the relief requested herein.

/s/ Steve Kardell

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing document has been submitted, by electronic means, to

all counsel of record on December 14, 2020.

/s/ Steve Kardell